

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

## IMPLICIT NETWORKS, INC.,

PLAINTIFF,

CASE No. C 10-4234 SI

V.

JUNIPER NETWORKS, INC.,

DEFENDANT.

**DECLARATION OF NIMA HEFAZI IN FURTHER SUPPORT OF  
JUNIPER NETWORKS, INC.'S REPLY IN SUPPORT OF ITS MOTION FOR  
SUMMARY JUDGMENT OF NON-INFRINGEMENT**

I, Nima Hefazi, hereby declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP and am counsel for Defendant Juniper Networks, Inc. (“Juniper”) in the above-captioned matter. I am a member in good standing of the State Bar of California and have been admitted to practice before the Court. I have personal knowledge of the matters set forth in this Declaration and, if called as a witness, could testify competently to such facts under oath.

2. Attached hereto as Exhibit A is a copy of excerpts from the Scott Nettles, Ph.D. deposition transcript dated October 19, 2012.

3. Attached hereto as Exhibit B is a copy of excerpts from Implicit's 30(b)(6) deposition transcripts, dated June 7, 2012 and August 16, 2012.

4. Attached hereto as Exhibit C is a copy of excerpts from the Oliver Tavakoli deposition transcript, dated June 19, 2012.

5. Attached hereto as Exhibit D is a copy of an excerpt from the Claim Construction hearing transcript, dated January 19, 2012.

6. Attached hereto as Exhibit E is a copy of the Court's Order Re Juniper's Motion To Compel Interrogatory Responses And Motion For Leave To File A Second Summary Judgment Motion, dated July 16, 2012. (Dkt. No. 113)

4 7. Attached hereto as Exhibit F is a copy of excerpts from Implicit's Sixth  
5 Supplemental Interrogatories Response to Juniper's Second Interrogatories, executed on July 27,  
6 2012.

7       8. Attached hereto as Exhibit G is a copy of an excerpt from the Scott Nettles, Ph.D.  
8 deposition transcript, dated November 6, 2012, taken in the litigation styled *Implicit Networks,*  
9 *Inc. v. F5 Networks, Inc.*, 10-cv-3365-SI.

10 9. Attached hereto as Exhibit H is Exhibit 2 from the Expert Report of Scott Nettles,  
11 Ph.D., dated August 15, 2012.

12        10.      Attached hereto as Exhibit I is copy of excerpts from the Scott Nettles, Ph.D.,  
13 deposition transcript dated October 9, 2012.

14 11. Attached hereto as Exhibit J is a copy of an excerpt from the Peter Alexander,  
15 Ph.D. deposition transcript dated October 16, 2012.

17 I declare under penalty of perjury under the laws of the United States that the foregoing is  
18 true.

Executed this 3<sup>rd</sup> day of December, 2012 at Newport Beach, California.

*/s/ Nima Hefazi*

Nima Hefazi